

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: MARGARET SMITH,  
Debtor**

**Case No.: 11-50349-KMS  
Chapter 13 Proceeding**

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**MOTION TO SHORTEN THE NOTICE PERIOD OF MOTION FOR AUTHORITY TO  
RELEASE INSURANCE PROCEEDS AND FOR DISTRIBUTION (DK #81)**

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COMES NOW the Debtor, MARGARET SMITH, by and through her Counsel of Record, David L. Lord, Esq., and files this Motion to Shorten the Notice Period of Motion for Authority to Release Insurance Proceeds and for Distribution (DK #81), and would show unto the Court the following, to-wit:

1. That the Debtor suffered a total loss of her vehicle as the result of an auto accident and is awaiting disbursement of an insurance settlement.
2. That the Debtor needs to obtain another vehicle for transportation and needs the remaining proceeds, once the lien holder's claim has been paid, to purchase a new vehicle.
3. That the Debtor wishes to shorten the Notice period on said Motion from twenty-one (21) days to seven (7) days, so that she can get a new vehicle sooner.
4. That none of the Creditors in this case will be adversely affected by a shortened Notice period.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that this honorable Court will enter its Order shortening the Notice period on the Debtor's Motion for Authority to Release Insurance Proceeds and for Distribution (DK #81) from twenty-one (21) days to seven (7) days. The Debtor prays for general relief.

RESPECTFULLY SUBMITTED this the 2<sup>nd</sup> day of February, 2015.

MARGARET SMITH,  
Debtor, by:

/s/ David L. Lord  
David L. Lord (G) MS Bar No. 1427  
David L. Lord and Associates, P.A.  
1819 24th Avenue  
Gulfport, MS 39501  
Phone: (228) 868-5667  
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**CERTIFICATE OF SERVICE**

I, David L. Lord, Esq., of David L. Lord and Associates, P.A., Counsel for the above-listed Debtors, do hereby certify that I have served, this day, either electronically by the *Notice of Electronic Filing*, or by First-Class U.S. Mail, a true and correct copy of the above and foregoing *Motion to Shorten Notice Period* to the following interested parties on this the 2<sup>nd</sup> day of February, 2015.

Henry G. Hobbs, Jr., Esq.  
United States Trustee  
USTPRegion05.JA.ECF@usdoj.gov

Warren A. Cuntz, Jr., Esq.  
Chapter 13 Trustee  
wacuntzcourt@cableone.net

Chase Auto Finance  
P.O. Box  
Greensboro, NC 27420

Nationwide Insurance  
1100 Locust St.  
Des Moines, IA 50391  
Claim #263087-GB

All Creditors on the attached  
Master Mailing Matrix

/s/ David L. Lord  
David L. Lord (G) MS Bar No. 1427  
David L. Lord and Associates, P.A.